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Of Attorneys for Defendant
Randy L L Corporation

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

NADIA ROBERTS, an individual, Plaintiff, v. RANDY L L CORPORATION, an Oregon Corporation, Defendant.	Case No. 3:24-CV-00523-HZ DECLARATION OF TED ROE IN SUPPORT OF DEFENDANT'S OBJECTIONS TO PLAINTIFF'S MOTION TO WITHDRAWAL
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I, Ted Roe, Esq., declare as follows:

1. I am an attorney for Defendant in the above-entitled matter and I have personal knowledge of the following facts and am competent to testify to the matters set forth below and the following is true to the best of my knowledge, information, and belief.
2. In an August 19, 2024, email to me, Plaintiff's counsel stated that "Ms. Roberts has authorized me to offer a dismissal of the suit and Release."

1 DECLARATION OF TED ROE IN SUPPORT OF DEFENDANT'S OBJECTIONS TO PLAINTIFF'S
MOTION TO WITHDRAWAL

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3. During a conferral with me on September 4, 2024, when I pressed Plaintiff's counsel as to when she last communicated with the Plaintiff, Plaintiff's counsel responded that she last communicated with her in "early August [2024]."
4. On July 24, 2024, defense counsel served on Plaintiff's counsel Defendant's First Request for Production of Documents ("1st RFP").
5. On August 7, 2024, defense counsel served on Plaintiff's counsel Defendant's Second Request for Production of Documents ("2nd RFP").
6. On August 7, 2024, defense counsel served on Plaintiff's counsel Defendant's First Set of Interrogatories ("1st Interr.").
7. On August 8, 2024, defense counsel served on Plaintiff's counsel Defendant's First Requests for Admissions ("1st RFA").
8. On August 13, 2024, defense counsel served on Plaintiff's counsel Defendant's Third Request for Production of Documents ("3rd RFP").
9. On August 19, 2024, Plaintiff's counsel emailed me requesting an extension of the time to respond to Defendant's 1st RFP. In response, I asked Plaintiff's counsel if she intended to have the requested documents to Defendant by August 30, 2024 or if she was planning on providing me with the Plaintiff's response to the 1st RFP by that date.
10. On August 21, 2024, Plaintiff's counsel sent me an email stating that she "would be supplying not just responses but the documents as well." On the basis of Plaintiff's counsel's representation, I consented to an extension of the Plaintiff's response and document production to August 30, 2024.

11. On August 26, 2024, Plaintiff's counsel transmitted to me Plaintiff's response to Defendant's 1st RFP. Plaintiff did not produce any documents and in bad faith, objected to every single request.
12. On August 27, 2024, I emailed Plaintiff's counsel stating that 1) no documents were produced despite Plaintiff's counsel's representation that documents would be produced; 2) that Plaintiff's response and objections were in bad faith, in violation of Fed. R. Civ. P. 11, 34 and 37; and 3) the specific issues with each of the objections Plaintiff made to each request. Plaintiff's counsel did not respond to this email.
13. On September 4, 2024, I conferred with Plaintiff's counsel in an effort to obtain the requested discovery, confer on Defendant's Motion to Compel discovery and confer on Plaintiff's Motion to Withdraw. Plaintiff's counsel refused to produce the requested discovery or amend her bad faith response and objections to Defendant's 1st RFP. Further, Plaintiff's counsel again stated that she had been in communication with Plaintiff's, as recently as last month.

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14. Further, I have requested Plaintiff's counsel propose acceptable dates for Plaintiff's

deposition on multiple occasions; however, Plaintiff's counsel has refused to respond.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 4th day of September, 2024.

VERITAS BUSINESS LAW

/s/ Ted Roe

Ted Roe, OSB No. 991004

(503) 207-0205

Of Attorney for Defendant

Randy L L Corporation

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **DECLARATION OF TED ROE IN SUPPORT OF DEFENDANT'S OBJECTIONS TO PLAINTIFF'S MOTION TO WITHDRAWAL** by:

- ☐ U.S. POSTAL SERVICE
- ☐ U.S. POSTAL SERVICE, CERTIFIED MAIL, RETURN RECEIPT REQUESTED
- ☐ FACSIMILE SERVICE
- ☒ ELECTRONIC MAIL
- ☐ HAND DELIVERY
- ☐ FEDERAL EXPRESS

addressed to the following named individual(s)/business(es) at their last known address(es) on the date stated below:

Jessica Molligan
Attorney at Law
PO Box 16893
Portland, OR 97292
jessicamolligan@comcast.net

DATED this 4th day of September, 2024.

/s/ Ted Roe
Ted Roe, OSB No. 991004
Of Attorney for Defendant